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February 13, 2025

**VIA ECF**

The Honorable Eric N. Vitaliano  
United States District Court for the  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Bishop v. I.A.T.S.E., Local 52, et al.*  
*Case No. 24-cv-06148-ENV-LKE*  
*Joint Proposed Briefing Schedule*

Dear Judge Vitaliano:

I write on behalf of I.A.T.S.E., Local 52 (“Local 52”) and with consent of Plaintiff Ronald Bishop (“Plaintiff”).

By Order dated January 31, 2025, Your Honor ordered that Local 52 may proceed with its anticipated motions to dismiss and directed the parties to file a joint proposed briefing schedule.

By Order dated February 11, 2025, Magistrate Judge Eshkenazi granted Plaintiff’s request for leave to make late service on additional defendants – Amazon MGM Studios, LLC, Sony Pictures Television, LLC, Apple Studios, Inc., and HBO Studios, Inc. – who were named in the Complaint, but have not yet been served (collectively, the “Unserved Studio Defendants”). Plaintiff’s deadline to serve the Unserved Studio Defendants is March 11, 2025.

In light of Magistrate Judge Eshkenazi’s Order, Plaintiff proposed and Local 52 agreed that further briefing on the anticipated motions to dismiss should be deferred until after the Unserved Studio Defendants are served.

Accordingly, Local 52 and Plaintiff jointly propose the following briefing schedule for Local 52’s anticipated motion to dismiss:

- The motion to dismiss and opening brief shall be filed by the later of: (1) April 10, 2025; or (2) the statutory deadline for the last-served of the Unserved Studio Defendants to respond to the Complaint; and
- Briefs in opposition to Local 52's motion shall be filed by the later of: (1) May 29, 2025; or (2) seven weeks after the motion to dismiss is filed; and
- Local 52's reply brief shall be filed by the later of: (1) June 18, 2025; or (2) three weeks after the opposition is filed.

We thank the Court for its attention to this matter.

Respectfully submitted,

*Mackenzie E. Clark*

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